United States Bankruptcy Court Southern - Texas
ENTERED
04/03/2017

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

IN RE:	§	
	§	
SERVICE EMPLOYEES INTERNATIONAL UNION – TEXAS	§	**CASE NO. 16-20483**
	§	
	§	
Debtor.	§	**Chapter 11**

STIPULATION AND AGREED ORDER

This Stipulation and Agreed Order is made by and between Professional Janitorial Service of Houston, Inc. ("PJS") and Service Employees International Union – Texas (the "Debtor"). The Debtor and PJS stipulate as follows:

A. On December 3, 2016, the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code initiating this case.

B. On February 3, 2017, the Debtor filed its Motion to Modify the Automatic Stay (Dkt. No. 59), to proceed with its appeal of PJS's judgment in the state appellate court.

C. On March 10, 2017, PJS filed its Objection to Debtor's Motion to Modify the Automatic Stay (Dkt. No. 73).

D. The Debtor's Motion to Modify the Automatic Stay is currently set for hearing on March 29, 2017.

E. The Debtor's section 1121(c)(2) exclusivity period is scheduled to expire on April 3, 2017, and the Debtor's section 1121(c)(3) exclusivity period is scheduled to expire on June 1, 2017.

NOW, THEREFORE, in consideration of the foregoing recitals, PJS and the Debtor agree and it is hereby **ORDERED** that:

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1. The Debtor's Motion to Modify the Automatic Stay is reset for April 19th, 2017 at 10:30 am, in Houston.

2. The Debtor's section 1121(c)(2) exclusivity period is extended to April 18th, 2017.

3. The Debtor's section 1121(c)(3) exclusivity period is extended to June 16th, 2017.

4. The Debtor shall not file a motion to extend exclusivity or otherwise seek to extend exclusivity pursuant to 11 U.S.C. § 1121(d).

5. PJS shall not file a motion to terminate exclusivity or otherwise seek to terminate the Debtor's exclusivity pursuant to 11 U.S.C. § 1121(d).

6. PJS shall not file a motion seeking to dismiss the case during the Debtor's exclusivity period.

7. Any party-in-interest (other than the Debtor and PJS) may move for reconsideration of this order on an expedited or emergency basis. The Debtor and PJS agree that any such motion may be heard on an expedited or emergency basis.

Signed: April 03, 2017.

DAVID R. JONES
UNITED STATES BANKRUPTCY JUDGE

1308226

Agreed as to Form and Substance:

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